

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Whitney Main, Henry Schmidt, and Daniel Grentz,
individually and as representatives of a class of
similarly situated persons, and on behalf of the
American Airlines, Inc., 401(k) Plan,

Plaintiffs,

v.

American Airlines, Inc., American Beacon Advisors,
Inc., Pension Asset Administration Committee,
Benefits Strategy Committee, Pension Benefits
Administration Committee, and Employee Benefits
Committee,

Defendants.

Case No. 4-16-cv-473-O

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23 and Local Civil Rule 23.2, and this Court's Order dated June 30, 2017 (ECF No. 124), Plaintiffs Whitney Main, Henry Schmidt, and Daniel Grentz respectfully move this Court for an order (1) preliminarily approving the parties' Class Action Settlement Agreement (which is attached as Exhibit 1 to the accompanying Declaration of Kai Richter); (2) approving the proposed Settlement Notices and authorizing distribution of the Notices; (3) certifying the proposed Settlement Class; (4) designating Plaintiffs as Class Representatives; (5) designating Plaintiffs' counsel as Class Counsel; (6) scheduling a final approval hearing; and (7) granting such other relief as set forth in Plaintiffs' proposed Preliminary Approval Order submitted herewith (which is also attached as an exhibit to the Settlement Agreement). This motion is based on the accompanying Memorandum of Law; the contemporaneously-filed Declarations of Kai Richter, Whitney Main, Henry Schmidt, and Daniel Grentz; and all files, records, and proceedings in this matter.

Dated: July 7, 2017

Respectfully submitted,

/s/ Kai H. Richter

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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with respective counsel of record for Defendants with respect to this motion. **Defendants do not oppose the motion as Parties to the Settlement Agreement.**

Date: July 7, 2017

/s/ Kai H. Richter

Kai H. Richter

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2017, a true and correct copy of **PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** was served via CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Kai H. Richter

Kai H. Richter